

# The Leniency Lobby

How the U.S. Lets Global Corruption off the Hook.

**70**

HIGH-RISK FOREIGN  
INDIVIDUAL PRINCIPALS

**\$38.1M**

SPENT ON LOBBYING  
SINCE 2013

**46**

CASES SEEKING TO  
ESCAPE ACCOUNTABILITY

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## AT A GLANCE

ACDC compiled a dataset of every FARA Exhibit AB submission from January 2013 to May 2026 — covering the last three full presidential terms (Obama, Trump I, Biden) as well as the first 17 months of the Trump II administration.

**3,002**

EXHIBIT AB  
FILINGS ANALYSED

**197**

INDIVIDUAL FOREIGN  
PRINCIPALS IDENTIFIED

**70**

HIGH-RISK  
INDIVIDUAL PRINCIPALS

**86**

COUNTRIES  
OF ORIGIN

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## EXECUTIVE SUMMARY

ACDC has found that alleged and convicted foreign criminals, along with officials embroiled in corruption scandals, are spending big to influence the U.S. government and escape accountability. Where once the U.S. was an anti-corruption leader, lobbying by high-risk individuals is helping turn Washington into an agent of impunity.

We identified 46 cases spanning the current and three previous presidential administrations in which foreign individuals accused of corruption and human rights abuses around the world have employed U.S.-based lobbyists to shield themselves from accountability, either at home or in the U.S.

The U.S.-based entities engaging in these activities include law firms, lobbying shops, PR agencies and individuals with political access. Analysis of cases shows that this lobbying apparatus has emerged largely in response to the U.S. government actively pursuing corruption and human rights cases using measures like the Foreign Corrupt Practices Act, KleptoCapture task force, Global Magnitsky and other OFAC sanctions regimes.

Worryingly, U.S. lobbyists' activities are not limited to helping clients reduce their legal liabilities in the United States. In over half of the most problematic cases, the focus of the lobbying is in the accused's home country, or in a third country or an international framework.

Our research draws on brand new analysis of filings by lobbyists under the Foreign Agents Registration Act (FARA). Under FARA, anyone doing political or lobbying work in the U.S. for a foreign entity must register with the Justice Department and regularly disclose who they are working for, what they are doing and how much they are being paid. While FARA offers some degree of transparency, the current state of disclosure is insufficient. Notably, there is no requirement that lobbyists declare their clients' connection to ongoing investigations or criminal history. The source of funds for these very expensive services present another potential problem. Our report identifies two countries in which prosecutors have investigated the payments to U.S. lobbyists over potential money laundering and campaign finance offences.

## KEY FINDINGS

- 01** Lobbying expenditures by high-risk foreign individuals have been noticeably higher during both the Trump I and the Trump II administration, \$19.2 million and \$9.8 million respectively compared to \$3.9 million under Biden.
- 02** There has been a sharp uptick in new high-risk lobbying relationship registrations in 2025, especially related to sanctions relief, with 13 new registrations, more than doubling the six registrations in 2024.
- 03** Despite FARA requiring the amounts spent on lobbying to be declared, **confirmed figures are only available for two-thirds of high-risk lobbying relationships.**
- 04** Detailed information filed under FARA shows attempts to undo anti-corruption enforcement from the previous administrations, indicating a worrying politicisation of international anti-corruption enforcement.
- 05** Lobbying on behalf of high-risk individuals threatens the global anti-corruption infrastructure, much of it built with U.S. support, as some influence campaigns seek to undermine the legitimacy not just of specific prosecutions, but entire courts and accountability processes.
- 06** The current disclosure process is failing to bring adequate transparency to foreign lobbying for natural persons, due to the use of proxy clients, opaque funding sources, and the persistence of vague, incomplete and inaccurate filings.

As part of restoring the U.S.'s anti-corruption enforcement and international leadership, Congress must close the gaps in the FARA system so that those facing accountability abroad cannot hide their attempts to buy impunity in Washington.

## RECOMMENDATIONS

Policymakers and the Department of Justice should strengthen FARA requirements and improve transparency and accountability, including through the following measures.

### FOR POLICYMAKERS & THE DEPARTMENT OF JUSTICE

- 01 Require that criminal history, any ongoing legal proceedings and sanctions status of the foreign principal must be declared under FARA upon registering and updated via amendments if there are changes in the foreign principal's status.
- 02 Increase the specificity of reporting requirements so that registration under Exhibit AB and activities described in supplemental filings include specific details on any accusations, legal cases and other issues that are being addressed through the lobbying.
- 03 Clarify the FARA registration requirements for presidential pardon petitioning and lobbying for sanctions delisting. This could include implementing the [suggested](#) rule change in January 2025 to clarify that the legal-representation exemption does not cover efforts to persuade people outside the proceeding, which should include the pardon and sanctions offices.
- 04 Develop a standardized, historical payment ledger for each foreign principal. With a requirement to be updated every six-months, the ledger would record all payments, including who actually made the payment and, if an intermediary or proxy was used, the ultimate payee.
- 05 Instruct lobbyists to conduct enhanced due diligence on the source of their fees if the client is a politically exposed person, is under U.S. sanctions, or has a criminal history. This should include a declaration submitted to the U.S. Department of Justice and strict enforcement for failing to conduct such due diligence. The name, occupation and relationship to the foreign principle of the person or entity ultimately paying for the services should be publicly available.

### FOR DOJ ENFORCEMENT OF THE CURRENT FARA STATUTE

- 01 Review filings to ensure that all activity taken on behalf of individuals is not hidden behind proxies. When activities primarily benefit a natural person, that individual should be accurately recorded as the foreign principal.
- 02 Investigate high-risk cases to ensure the funds used to pay lobbyists were not the proceeds of a crime or corruption. Registrants should accurately record the source of funds.
- 03 Ensure the full chain of payment is accurately recorded, with appropriate registrations for foreign nationals paying for lobbying services for other individuals.
- 04 Proactively demand the submission of amendments by registrants for all identified errors, inaccuracies, omissions and missing files in past filings. Registrants should pre-emptively file amendments and request clarification from FARA when needed.

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## INTRODUCTION

Investigations into foreign lobbying in the U.S. have often focused on how authoritarian states cozy up to the U.S. government or disseminate their propaganda to U.S. audiences. Such influence operations can give rise to a host of corruption risks, with U.S. government officials and elected representatives sometimes becoming co-opted through personal or political favours, eventually acting in the interests not of their constituents or their own government, but their paymasters overseas.

However, a significant amount of foreign lobbying in the U.S. is done not in the name of foreign governments, state-owned enterprises, sovereign wealth funds or corporations, but of private individuals with interests to advance in Washington. Notable cases reported in the media have involved the protagonists of major transnational corruption scandals such as the 1MDB embezzlement and money laundering case in Malaysia, and the plundering of Angola's natural resource wealth.

These individuals have hired lobbyists to try to blunt the enforcement of their cases, by arranging meetings with lawmakers, filing petitions for pardons, and influencing the public narrative through strategic communications and public relations.

Concerned that the widely reported cases do not reveal the true extent of this activity or its implications for anti-corruption enforcement around the world, ACDC set out to comprehensively investigate these individual lobbying clients, or “foreign principals” in the language of the Foreign Agents Declaration Act (FARA), the 1938 legislation which requires foreign lobbying to be declared to the Department of Justice, which publishes the filings it receives online.

In the current political climate, this research has particular urgency. Whereas USAID and the State Department's anti-corruption specialists were once leaders in advancing anti-corruption reforms and helping build institutions around the world, these have been eliminated by the current administration. The TaskForce [Kleptocapture](#) and Kleptocracy Asset Recovery [Initiative](#) have been disbanded. Fears are growing that the Department of Justice has become highly politicized, while accusations of [pay-to-play pardons](#) are growing louder in Washington. Economic sanctions imposed to combat corruption, serious organized crime and human rights abuses appear to have become negotiable. U.S. enforcement of anti-corruption legislation such as the Foreign Corrupt Practices Act was [paused](#) in 2025, then refocused onto a narrower set of priorities to protect the interests of U.S. companies.

In such a context, lobbying campaigns for natural persons implicated in corruption could not only find a receptive audience in the corridors of power, it could have a corrosive effect as years of U.S. leadership on anti-corruption enforcement meets well-financed and effective opposition. Such a scenario serves not just the individuals hiring lobbyists, but the corrupt and authoritarian regimes and transnational criminal networks to which they may be connected.

It is more crucial than ever to understand in detail how U.S. actors enable impunity for corruption around the world.

## WHO HIRES U.S. LOBBYISTS?

To analyze lobbying by foreign natural persons, ACDC compiled a dataset of all Exhibit AB submissions under FARA from January 2013 until May 2026. This time period covers the last three full presidential terms (Obama, Trump I, and Biden), as well as the first 17 months of the Trump II administration. Exhibit AB combines the two forms used to register a foreign agent's (known as a registrant) relationship with a new foreign principal, the foreign national.

The dataset contains 3,002 Exhibit AB filings, or unique relationships between a foreign principal and a registrant. Based on answers to question seven on Exhibit A forms, foreign principals were then divided into three categories: legal entities (companies, organizations and political parties), governments (including ministries, embassies and agencies) and individuals (natural persons).

After de-duplication of individuals with more than one registrant, ACDC was able to identify 197 individual foreign principals from 86 countries that have hired U.S. representatives since 2013. We investigated the background of every individual and group them into "high-risk" and "low-risk" categories as described in Table 1, based on whether they had been credibly accused of corruption, human rights abuses, sanctions breaches, or other conduct raising significant public-integrity concerns. We plot the number of individuals falling into each category in Figure 1.

TABLE 1 · RISK CATEGORIES FOR FOREIGN INDIVIDUAL PRINCIPALS








CATEGORY	EXAMPLE / DEFINING CRITERIA	RISK
 <b>US-Sanctioned for Corruption/Human Rights</b>	OFAC SDN listing or State Dept. action for corruption / human-rights abuse, e.g. Global Magnitsky designation, Engel List.	 <b>HIGH</b>
 <b>Sanctioned (Other)</b>	Sanctioned on some other basis in the U.S. or by another jurisdiction, e.g. Russia sanctions, non-U.S. (EU / UK / Canada) listings.	 <b>HIGH</b>
 <b>Under a Legal or Corruption Cloud</b>	Named in a legal case (indictment, prosecution, conviction, civil suit) in the U.S. or another jurisdiction, or facing corruption / human-rights allegations from credible media without a sanction designation or official legal case.	 <b>HIGH</b>
 <b>Politically Persecuted</b>	Named in a legal case widely criticised by human-rights organisations (Amnesty, HRW, UN bodies) as flawed, politically motivated or retaliatory, e.g. opposition figures, dissidents and journalists prosecuted by their own government.	 <b>LOW</b>
 <b>No Adverse Flags</b>	No sanctions, legal cases or corruption / human-rights allegations identified; lobbying representation such as trade, investment promotion, tourism or general diplomatic or communications outreach.	 <b>LOW</b>

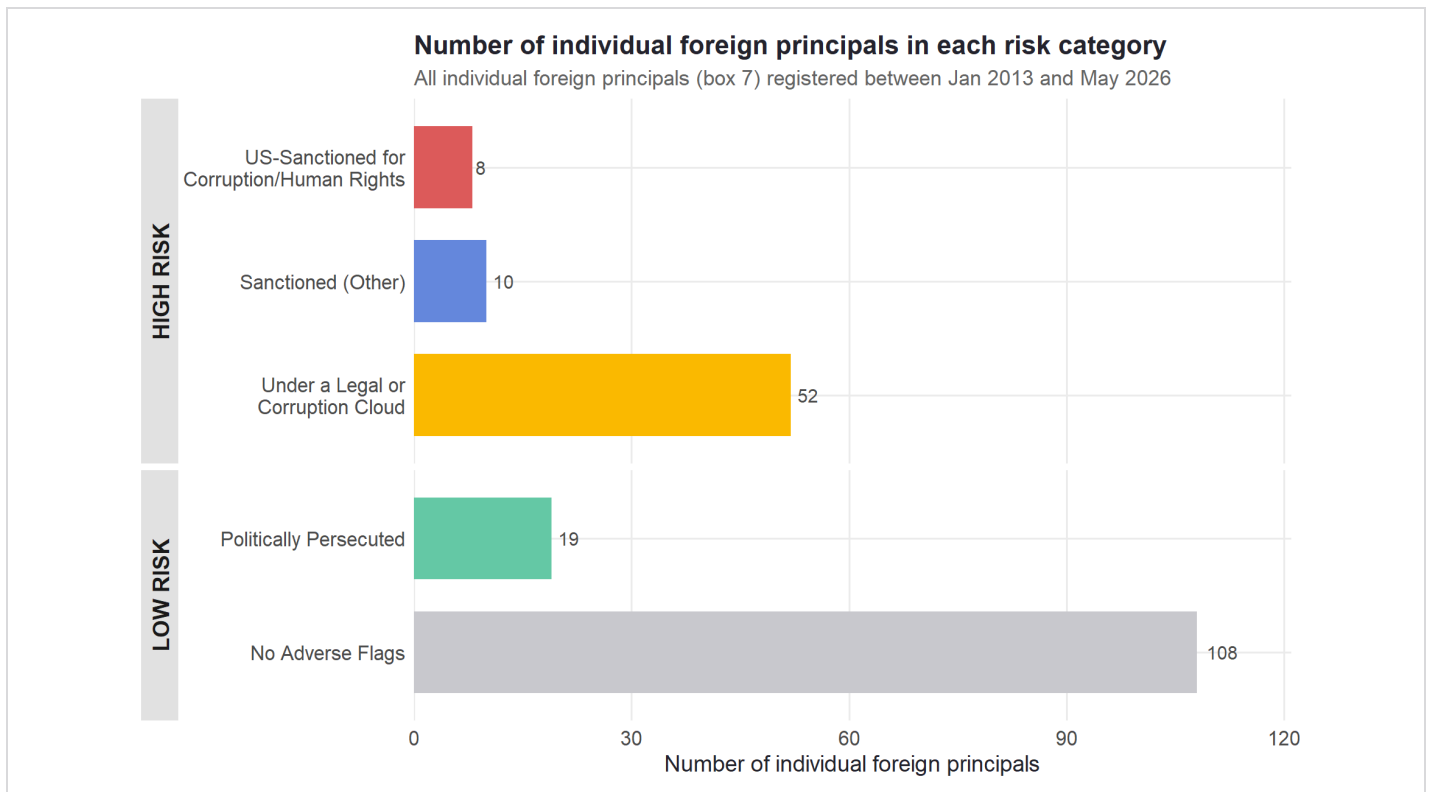
Table 1: Each individual foreign principal is assigned to one of five risk categories (three high-risk, two low-risk) using hand-coded flags based on Exhibit AB filings, publicly available sanctions lists, legal cases and public media reporting. Row colors correspond to the bars in Figure 1.

Just over half of these individuals (108) are deemed “low-risk”. Some engage U.S. representatives to promote their own economic interests. Others are effectively acting as backchannels between the U.S. and their own government. Still others conduct public relations campaigns in the U.S. to serve the interests of their own government’s foreign and domestic policy goals. In addition, nineteen individuals who have hired U.S. representatives are subject to legal attacks that independent watchdog groups have said are politically motivated. For the purposes of this study, we assign all these a low risk profile and largely set them aside for the following analysis.

That leaves 70 foreign individual principals — over a third of the total — who have hired U.S. lobbyists since 2013 and fall into one of the three “high-risk” categories. Fifty-two of these are named in a legal case in the U.S. or elsewhere, or have been credibly accused of corruption in media investigations. Of these, 26 face legal cases in the U.S. or abroad for engaging in corruption or human rights abuses, while 15 face legal cases for other types of misconduct (such as fraud). The remaining 11 have been accused of corruption by credible media outlets, but are not currently facing charges.

Eight members of the high-risk group have been sanctioned by the U.S. government under programmes to combat corruption and human rights abuses. There are also 10 individuals facing sanctions for other reasons, such as business activities linked to authoritarian regimes in Russia or Iran that have been targeted by sanctions.

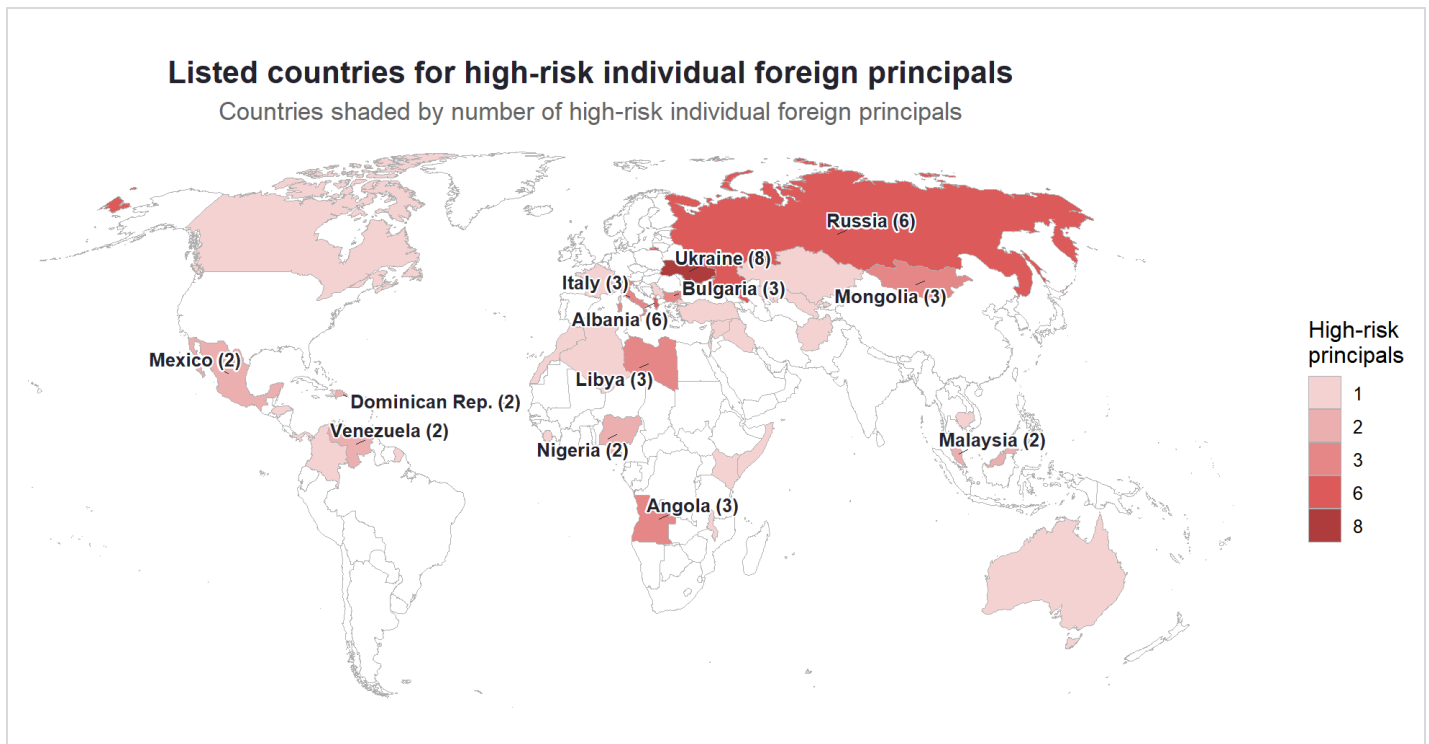
Even for the highest risk individuals, retaining U.S. lobbyists or legal representation is not, in itself, unlawful in any way. As long as it is properly registered in accordance with FARA, paid for with legally obtained funds and its activities are lawful in nature, any foreign individual may contract U.S. persons or firms to represent their interests regardless of their background. Prosecutions related to FARA have been linked to non-disclosure rather than the advocacy itself.



**FIGURE 1**

The number of individual foreign principals registered between January 2013 and May 2026 assigned to each of the five risk categories, and grouped into high-risk and low-risk.

We focus on the high-risk cases for the remainder of the report. Figure 2 maps all countries from which high-risk foreign individuals contracted U.S.-based lobbyists in relationships declared under FARA. Most, but not all, of these countries score very poorly on the most respected indexes of corruption, such as Transparency International's [Corruption Perceptions Index](#) and the World Bank's Worldwide Governance [Indicators](#), particularly its Control of Corruption measure.



**FIGURE 2**

Map showing the country of nationality listed for high-risk individual foreign principals on Exhibit AB filings. Filings allow multiple countries to be declared for each foreign principal, but often registrants only write a single country. In some filings for dual citizens analyzed by ACDC, the country with stronger governance and closer ties to the U.S. was the only one declared.

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## WHAT DO HIGH-RISK LOBBYING CLIENTS WANT?

Exhibit AB forms filed under FARA ask registrants to fully describe their activities and include any contracts that outline what successful lobbying looks like. Across all filings, we categorized the declared goals into more cohesive topics, including diplomatic relations, business and trade, public health and development, political reform, elections and security.

Many high-risk clients hire U.S. representatives specifically to help achieve goals related to their legal case, visas or sanctions. For example, Jho Low, the indicted [alleged](#) mastermind of the 1MDB scandal [hired](#) five registrants who worked for him between 2018 and 2024. Their AB Forms [describe](#) Low as a “global philanthropist, investor and entrepreneur” with no mention of his criminal history or political ties. In addition to influencing the government, lobbying efforts [included](#) content creation such as videos and social media posts aimed at shifting public opinion about the cases. More than \$3 million was paid by two [nominees](#), which *Project Brazen* has described as a means of obscuring the true source of funds. In a statement issued after the 2018 charges, Low said he “maintains his innocence.”

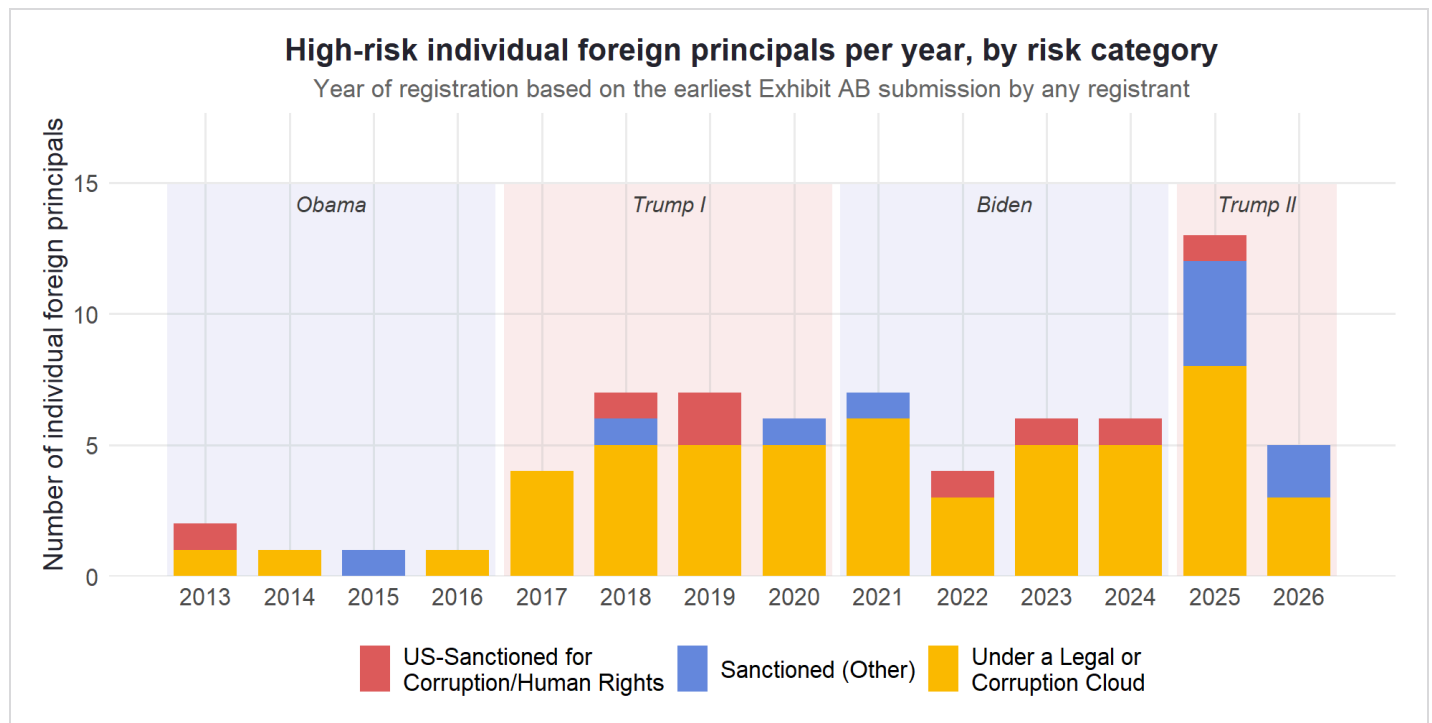
While some foreign principals aim to reverse consequences, others are pre-emptively attempting to avoid them. According to FARA filings from late May 2026, Cambodia’s Deputy Prime Minister and Minister of Interior, Sar Sokha, [hired](#) a law firm to provide “legal services and assistance in connection with communications with the U.S. Treasury’s Office of Foreign Assets Control (‘OFAC’) and a certain U.S. Congressional Committee for the purpose of addressing any potential wrongful inclusion of [Sokha] in [House Resolution 5490, the Dismantle Foreign Scam Syndicates Act] or otherwise designated by OFAC or the U.S. State Department for related allegations.”

As reported by the [Organized Crime and Corruption Reporting Project](#) (OCCRP), a draft of the [Dismantle Foreign Scam Syndicates Act](#) named Sokha as someone the White House should consider placing under sanctions. Several people on the list have been sanctioned by OFAC for their ties to the Prince Group conglomerate, which has been [accused](#) by the U.S. and U.K. governments of benefiting from “a global criminal enterprise built on scam compounds, fraud, and money laundering”. But not Sokha, even though researchers have [linked](#) him to the same corporate network. The [filing](#) is notable as it states that representation does not include political activities, despite describing the work being plainly directed at influencing the OFAC designation process. An Interior Ministry spokesman and a Prince Group spokesperson [told](#) OCCRP Sokha, Prince Group and its chairman were innocent of these accusations.

Arrangements to achieve the same goal range from formal, multi-firm contracts to more causal arrangements without written agreements. The State Department included former Honduran vice president Elvin Ernesto Santos Ordonez on the Engel List, which designates individuals in El Salvador, Guatemala, Honduras and Nicaragua who have engaged in significant corruption, undermined democratic processes or obstructed investigations. According to FARA [filings](#), Santos Ordonez engaged an “acquaintance” to whom he was introduced while they were “developing information for the DOJ regarding narco activities” to set meetings with the proper authorities to get Santos Ordonez removed from the list.

## CHANGES IN HIGH-RISK LOBBYING OVER TIME

Prior to 2017, there were few registrations whatsoever for individual foreign principals under FARA. These dynamics began to shift dramatically in 2017 following the [prosecution](#), and later [pardon](#), of Paul Manafort for acting as an undeclared lobbyist for the government of Ukraine. A 2025 [study](#) found that “enforcement against Manafort caused a widespread, sustained, and economically significant reduction in FARA noncompliance.” Fearful of falling afoul of U.S. law enforcement, U.S. lobbyists began more assiduously filing their relationships with foreign entities of all types.



**FIGURE 3**

*New registrations of high-risk individual foreign principals, stacked by risk category. The year of registration is based on the earliest Exhibit AB submission by any registrant.*

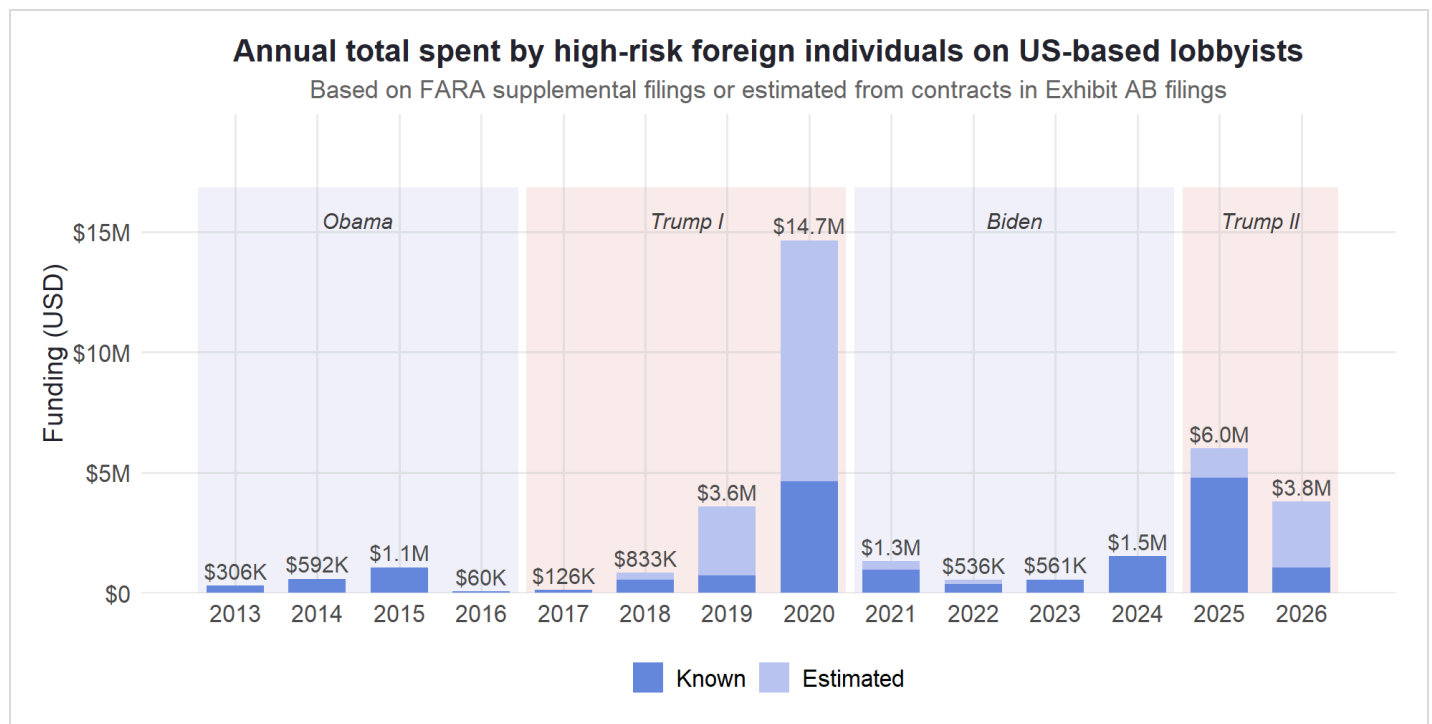
We see this dynamic clearly in Figure 3, which shows a sharp uptick beginning in 2017 and lasting through the Trump I and Biden administrations. These increases occurred against a backdrop of an increasing use of individual sanctions by the U.S. government, from which many clients sought relief, or de-listing, with help of U.S.-based lobbyists.

The first two years of the Trump II administration have seen an increase in high-risk foreign individuals lobbying in the U.S. A record thirteen high-risk individuals were registered in the first year of Trump II. The five new high-risk clients registered in the first five months of 2026 already outnumber the total for some earlier years. These increases are driven both by individuals seeking sanctions relief as well as other actors accused of complicity in corruption and human rights abuses.

The surge in filings may be due to a perception that the Trump administration is both more open both to dropping sanctions and willing to side with those accused of corruption rather than prosecute them. The administration's use of presidential pardon power to [nullify](#) the convictions of several individuals found guilty on corruption charges, with potentially [more](#) pardons on the horizon, lends weight to this perception. In the [words](#) of Elizabeth Oyer, former attorney with the Department of Justice's Office of the Pardon Attorney, "Trump has totally upended the clemency system as we know it." In the case study section presented below, we discuss several different examples of individuals investing considerable resources in trying to persuade Trump II administration officials to offer amnesty or other types of assistance.

## HOW MUCH IS BEING SPENT?

Hiring U.S. lobbyists is an expensive endeavor, both for domestic corporations or advocacy groups as well as for foreign actors. Calculating exactly how much foreign individuals are spending on foreign lobbying is complicated by the deficiencies of the FARA filing system. For 46, or 66%, of the high-risk foreign clients, we are able to observe the exact dollar amount paid to U.S. lobbyists.<sup>1</sup> For the remaining 24 clients, we are unable to observe payments either because both the client and registrant refuse to disclose the payments made (citing an exemption because legal services were also provided) or because the filing was incomplete and did not include a dollar amount. For nearly half of these missing cases, we were able to impute the total costs from the amounts stated in the original contracts. However, without further filing, we do not know for certain if the amounts originally contracted were actually paid.



**FIGURE 4**

Annual U.S. lobbying spend by high-risk foreign individuals, as reported in FARA supplemental filings or estimated from contracts included with Exhibit AB filings. As these totals only reflect the 81% of cases where a dollar amount was declared or could be estimated, they should be treated as underestimates.

In Figure 4, we see that spending by high-risk foreign individuals has been noticeably higher during both the Trump I and the Trump II administrations. The elevated spending under Trump is a function of both the higher number of registrations in some years (see Figure 3) and a higher average value of the contracts. For example, under the Biden administration (2021–2024), foreign individuals spent roughly \$190,000 on each lobbyist relationship, compared to an average of \$490,000 from 2025 onwards under President Trump.<sup>2</sup>

The largest confirmed payment also occurred during Trump’s second administration. In March 2024, the Department of Justice sought to [forfeit](#) two luxury New York City apartments purchased for \$14 million by the former Prime Minister of Mongolia, Sukhbaatar Batbold, and his son. The DoJ complaint alleged that the apartments were purchased with the proceeds of “a corruption scheme.” In late 2024, Batbold and his son [hired](#) two [lobbying](#) firms, which “met with members of Congress and the incoming Trump Administration to arrange meetings and discuss issues regarding foreign principal’s pending legal matter.” According to [2025 and 2026](#) filings, the pair paid at least \$4.8 million, or a third of the value of the apartments. Bathold [denies](#) allegations against him.

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## WHERE FARA FALLS SHORT

Rather than prohibit foreign influence, FARA rightly aims to bring transparency to foreign lobbying and enable public scrutiny of how foreign actors seek to shape American public opinion and policymaking, as well as who financially benefits from those efforts. In order for the system to work, registrants need to file accurate records, be explicit about their political activities, transparently record the payments they've received, and be clear about who they work for. The increase in individual foreign principal filing since 2017 is one significant step towards FARA operating as intended. Unfortunately, a close examination of the high-risk individual foreign principals reveals many other ways FARA is falling short. These include:

- **Use of proxy foreign principals:** registering an entity or political party as the foreign principal. This can obscure the fact that lobbying efforts are being done on behalf of an individual.
- **Inadequate due diligence into the source of funds** used to pay lobbyists, particularly in high-risk cases such as politicians and sanctioned individuals, or where payment may come from a third party or the proceeds of a crime.
- **Inaccurate or vague filings** that understate the scope of political activities, do not include important context about the foreign principal or omit the materials disseminated as part of lobbying efforts.
- **Failure to file at all**, or filing only after prosecution or public exposure of lobbying efforts.

### PROXY FOREIGN PRINCIPALS

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Our analysis likely undercounts the number of cases which help high-risk individuals because lobbyists sometimes register a relationship with an entity or political party rather than the individual themselves.<sup>3</sup> This makes it difficult to determine on whose behalf the activity is truly conducted, as well as where the money comes from. Large payments from an entity or political party may raise fewer questions than if the same amount was spent by an individual, and may help obscure the provenance of funds or avoid tax liabilities. In all, 43% of high-risk principals had either a company, a law firm, a political party, a family member or another individual pay their fees.

In 2019, a company [controlled](#) by the businessperson and former first daughter of Angola, Isabel Dos Santos, [registered](#) with a U.S.-based lobbyist. The company paid the lobbyist more than \$1.5 million before the lobbyist filed a notice terminating the relationship with the company in 2022 and [registered](#) Dos Santos herself as the client. No further payments were made. Dos Santos [faces](#) embezzlement and money-laundering charges in Angola, asset [freezes](#) and [sanctions](#) across several jurisdictions based on [accusations](#) that her fortune was built using Angolan state resources. Relying on information contained in her individual registration alone likely underestimates the amount she has paid lobbyists to help end her prosecutions in Angola and elsewhere. Dos Santos [has stated](#) she's a victim of a political "witch-hunt" and claims her innocence.

Registering an entity as the client can also help mask the real intent of lobbying, along with declaring vague and unremarkable goals.

In 2025, the Democratic Party of Albania (DPA) [hired](#) a U.S. lobbying firm to establish relationships to “facilitate policy development,” and “provide support to promote democracy, anti-corruption initiatives, and governmental reforms,” under a \$250,000 monthly retainer for 24 months. The party’s leader and former Albanian prime minister Sali Berisha was [designated](#) by the State Department in 2021 under Section 7031(c) “due to his involvement in significant corruption.” This resulted in Berisha and his immediate family members being banned from travelling to the U.S. The informational materials filed by the lobbyists for the DPA suggest that the campaign has focused predominately on [lifting](#) the 7031(c) designation of Berisha. Even after the May 2025 Albanian parliamentary election had passed (the ostensible reason for Berisha to travel to the U.S.), Berisha’s lobbyists [continued](#) to press for the lifting of his designation and travel ban. In June 2026, Berisha [announced](#) that he could now return to the U.S. Berisha [argues](#) the sanctions decision was political.



*Excerpt from lobbying materials filed on behalf of the Democratic Party of Albania, arguing Berisha's U.S. Section 7031(c) designation should be lifted.*

Other individuals can also be registered in place of the true beneficiary. In February 2025, Andriy Nakhod, a Ukrainian lawyer, [retained](#) a media production company on a pro-bono arrangement. Nakhod is counsel to Oleh Kulinich, the former Ukrainian security-service official on [trial](#) for spying for Russia. Explicit goals of the agreement filed with the registration included producing investigative journalism, advocacy and “informational support” to protect the interests of Kulinich. However, Nakhod, not Kulinich, is named as the foreign principal, creating a layer between the registrant and the ultimate beneficiary of their work.

There are signs that the Department of Justice’s FARA Enforcement Unit would enforce requirements for registrants to accurately identify the true foreign principal. In one case involving a lower-risk foreign principal, DoJ [requested](#) that the registrant declare the individual foreign principal rather than a corporate entity, after the registrant reached out to request clarification. The Saudi American Public Relation Affairs Committee (SAPRAC), a Delaware-[incorporated](#), Washington-based nonprofit founded and led by Saudi national Salman al-Ansari, ran a multimillion-dollar [campaign](#) attacking Qatar over alleged terrorism financing, including the [website](#) “The Qatar Insider,” which [presented](#) itself as independent journalism. According to the FARA unit, the firm was not allowed to register only the domestic entity, but had to [file](#) under FARA for the foreign national.

Other registrants should take caution to appropriately file, while the FARA registration unit should pay close attention to the high-risk cases identified here.

## SUSPICIOUS SOURCE OF FUNDS

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Hiring U.S. lobbyists is expensive. Such high costs run the risk of illicit funds being used by foreign actors to pay their bills, especially when some high-risk foreign principals are under sanctions or charged with illicit finance and corruption charges.<sup>4</sup> In a quarter of high-risk cases, filings did not disclose who paid the lobbyists. Foreign lobbyists should be required to conduct enhanced due diligence to ensure they do not accept illicit funds, the proceeds of corruption or funds from a sanctioned individual. In fact, in at least two cases, politically connected individuals from high-corruption countries have been investigated in their home countries over their hiring of U.S. lobbyists.

Albanian politician Lul'zim Basha appears in our dataset with a 2025 [pro-bono](#) contract registering him personally as the foreign principal. In 2017, his party had hired a different U.S. lobbyist under a [contract worth up to \\$950,000](#). According to a *Follow the Money* [investigation](#), a shell company that paid some of the lobbying fees is tied to sanctioned Russian oligarch Oleg Deripaska. Albanian prosecutors previously [opened](#) an investigation, but no charges were imposed. Basha [responded](#): “The Democratic Party has never received any foreign funding, much less from a Russian source” and denies the party has broken any law.

In Algeria, a \$10 million fee became the subject of official investigation. Ali Haddad, one of the country's richest men, was sentenced to 18 years in March 2019 and [accused](#) of receiving billions in bank loans for projects acquired in backroom deals. He [hired](#) a lobbyist shortly afterwards, even though the state had seized his and his family's assets. The public prosecutor opened a judicial [probe](#) into how lobbyists in Washington were paid. His lobbyist reportedly explained that “friends” paid the fees. The [filings](#) contain even more opacity, including only Exhibit A but omitting Exhibit B, which would contain the full description of activities. The Algerian probe also examined the true purpose of the lobbying, since the only description on file is “business and personal advisory services” and “other services on an agreed-upon basis.” The Haddad's lawyers [condemned](#) his verdict, calling it “obviously political.”

As [Mother Jones](#) has documented, the 2025 campaign for the Democratic Party of Albania was paid for by the “Make Albania Great Again Foundation” — an organization recently established by a New Jersey contractor and registered at a suburban residential address.” The foundation or its source of funds is not [named](#) in the filing, though an Albanian-American is [named](#) as the financial guarantor of the contract. The Special Anti-Corruption Structure (SPAK) [reportedly](#) opened an investigation into the contract.

Sanctions complicate matters further, but one example shows how this can be carefully managed. Monica Maria Castro Jaramillo was [designated](#) by OFAC in July 2010 for supporting a Colombian cocaine trafficker. In 2025, a law firm [disclosed](#) that it had been retained to seek her removal from the OFAC sanctions list, although the filing did not characterize that work as political activity. The [engagement](#), however, was formally with Castro's son-in-law, not Castro herself. In a separate AB Exhibit [filed](#) for him, the firm stated that he was “financially responsible for all expenses incurred during the OFAC removal process” and that it would seek an OFAC license solely to receive his payments.

## INACCURACIES AND VAGUENESS IN FILINGS

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We observed a number of worrying trends in the accuracy, precision and completeness of filings that make it challenging to evaluate exactly how foreign principals are influencing U.S. policy makers and public opinion. These include:

- Vague and unfocused description of activities.
- Discrepancies between the descriptions of activities in the initial Exhibit AB and later supplemental filings and informational materials.
- Limited information after the initial Exhibit AB registration, such as description of activities or recording of payments in supplemental filings.
- Lack of pertinent information in the description of the foreign principal, such as their sanction status, status as a politically exposed person (including family and associates of politicians) and relevant criminal history.

FARA focuses on political activities and includes exemptions for legal representation. Firms interpret both aspects of this inconsistently. As noted in our review of annual spending, several firms invoke legal representation exemptions to avoid disclosing the full amount they have been paid. The same vagueness also extends to why a principal is seeking a lobbyist. The stated goals in Exhibit AB filings range from explicit objectives — obtaining a visa after a rejection, securing removal from a sanctions list, or seeking a presidential pardon — to aspirations broad enough to reveal little, such as improved economic cooperation or educating American audiences.

That gap is not evenly distributed: when we compared the stated primary goals of high-risk principals, those facing sanctions or charges linked to corruption were markedly less likely to name the removal of those consequences as the aim of their lobbying. In cases not involving corruption, roughly 80% identified lifting the sanction or resolving the case as the primary objective, while in corruption cases, only about half did.

Two common goals for recently registered high-risk principals, sanctions delisting and presidential pardons, are legal in nature but unmistakably political in effect. Because firms interpret FARA's exemption for legal representation differently, these filings often obscure the real objective of the engagement.

The lobbying on behalf of Venezuelan-Italian banker Julio Herrera Velutini illustrates how open-ended descriptions, coupled with minimal follow-up disclosure, can obscure the purpose of a high-stakes engagement. On January 15, 2026, Herrera Velutini received a [pardon](#) from President Trump for charges of conspiracy, bribery and wire fraud in Puerto Rico. He first appears in FARA filings in December 2022, when a lobbyist group [registers](#) the relationship and states it is operating on behalf of his law firm. The law firm did not register under FARA. The description of [activities](#) states only that the "Consultant will engage with the United States Government on the client's situation" and act according to the law firm. The lobbyist group submitted no informational materials and across seven supplemental filings recorded \$250,000 in payments and a single meeting with a CIA representative.

While not a direct requirement under FARA, a lack of contextual information, such as someone's political or sanction status, changes how declared activities can be interpreted. After the U.K. [sanctioned](#) the Dutch oil trader Niels Troost and his company in February 2024, he [spent](#) \$610,000 between March and August 2024 on "researching potential sanctions" and advancing his "personal and commercial interest." The Exhibit AB, drafted days after the U.K. announcement, does not [mention](#) the U.K. sanctions.<sup>5</sup> His efforts to avoid being sanctioned personally appeared to have succeeded, though OFAC [sanctioned](#) one of his companies in January 2025. On his personal [website](#) Troost claims he is the victim of a substantial black media campaign and he holds no interest in any company trading or shipping Russian oil.

Sometimes the vagueness raises more questions than it answers, particularly when comparing the description of activities against a principal's legal situation. Rafael Alejandro "Alito" Moreno Cárdenas, a Mexican senator and national president of the Institutional Revolutionary Party (PRI), [hired](#) a U.S. public relations firm in April 2026 at \$10,000 a month. The declared activity is confined to "guidance limited to personal presentation and physical positioning for photographic purposes" during his engagements with U.S. officials. It explicitly states it will not be involved in any lobbying or influence activity. The file omits any mention of Moreno's situation at home. The Campeche Anti-Corruption Prosecutor's Office [accused](#) Moreno of diverting 83.5 million pesos (over \$4.7m) in public funds in July 2025, after previously alleging [illicit enrichment, embezzlement, and abuse of authority](#). Mexican media have [discussed](#) how Moreno is spending time in the U.S., noting it may be to potentially evade prosecution or shore up his standing with American officials. Moreno has [rejected](#) the corruption allegations.

**9. Describe fully the activities the registrant engages in or proposes to engage in on behalf of the above foreign principal.**

Registrant coordinates and facilitates the scheduling and logistics of meetings between the foreign principal and officials of the United States Government, including members of Congress and other federal government representatives. Registrant provides guidance limited to personal presentation and physical positioning for photographic purposes in connection with the foreign principal's engagements with United States Government officials. Registrant facilitates photo opportunities during meetings and official engagements. Registrant does not engage in lobbying, policy advocacy, or the preparation, distribution, or dissemination of informational materials on behalf of the foreign principal.

*Excerpt from the Exhibit AB filing describing Moreno Cárdenas's engagement as limited to "personal presentation and physical positioning for photographic purposes."*

## FAILURE TO FILE OR UNTIMELY FILING

Several prosecutions provide insight into previously lobbying activity that went undeclared during the time period studied. For example, Jho Low and former Prime Minister Razak covertly hired US lobbyists and public relations specialists to help make 1MDB investigations in the US go [away](#). These people, including American businessman Elliot Broidy and the rapper Prakazrel “Praz” Michel, did not declare themselves as registrants under FARA. As a result, Broidy and Michel were indicted, with the former [pleading guilty in 2020](#) and the latter [convicted in 2023](#).

Former CIA official Dale Britt Bendler [pleaded](#) guilty in 2025 to acting as an unregistered foreign agent after [attempting](#) to leverage his access in Washington to influence an embezzlement investigation in Angola on behalf of a client linked to the country’s sovereign wealth fund. Sovereign wealth funds are profoundly susceptible to [corruption](#) due to a lack of transparency and independent political oversight. Bendler also used his CIA position to try to influence a separate U.S. visa decision involving another client alleged to have ties to terrorism financing. In his filings, Bendler explained he was [paid](#) by another firm, which does not appear to have filed on behalf of the same clients.

9. Describe fully the activities the registrant engages in or proposes to engage in on behalf of the above foreign principal.

two phases:

first, FP was co-managing Angola's sovereign wealth fund right in the middle of an Angolan presidential election (September 2017). He needed help managing the new president, ie. so FP could continue to manage the sovereign wealth fund.

second, after the new Angolan president was elected, FP was accused/charged with embezzlement by the government of Angola and for awhile imprisoned. BGR and I attempted to persuade the government of Angola to go easy on him.

*Excerpt from Bendler's belated FARA filing describing his activities on behalf of an Angolan sovereign-wealth-fund client.*

There are exemptions to FARA including humanitarian or religious workers, legal representation, diplomats and bona fide news organizations, such as the law firm that hired Bendler. Although more sanctions-relief work is now being disclosed through FARA, some notable sanctions-relief lobbying campaigns have not been registered. Dan Gertler, a sanctioned Israeli businessman, worked with two American lobbyists who registered neither Gertler nor any of his companies as a foreign principal, [according](#) to the *Washington Post*. According to the Treasury Department, [Gertler](#) “amassed his fortune through hundreds of millions of dollars’ worth of opaque and corrupt mining and oil deals in the Democratic Republic of the Congo (DRC).” He successfully had sanctions against him [eased](#) under the first Trump administration, but they were then [reimposed](#) under Biden. Gertler strenuously [denied](#) accusations of sanctions evasion made by Global Witness.

There are also several cases in which filings were submitted long after the activities occurred, preventing the American public from monitoring foreign influence in real time. For example, Bendler [submitted](#) filings in 2025 for lobbying that took place between 2017 and 2019. In another case, filings followed only after a media outlet exposed the lobbying. Atiku Abubakar, a presidential candidate in Nigeria and former vice president, was placed under a U.S. [visa ban](#) tied to bribery and money-laundering allegations from his time in office. In 2018, he [retained](#) several lobbyists to secure a visa for meetings with U.S. policymakers, and the ban was lifted in time for a January 2019 visit. *Reuters* [reported](#) that one firm had been paid \$80,000 to help obtain the visa in February 2019, but that [contract](#) did not reach the FARA registration unit until February 2021, two years later. A separate [filing](#), disclosing a two-month-old \$150,000 contract, was submitted just a week after the *Reuters* article ran. In the run up to the 2027 elections, Abubakar [signed](#) a \$1.2 million contract in March, part of a wave of candidates [lobbying](#) the Trump administration, according to the *Africa Report*. Atiku [denies](#) all allegations of wrongdoing.

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## PRESIDENTIAL PARDONS

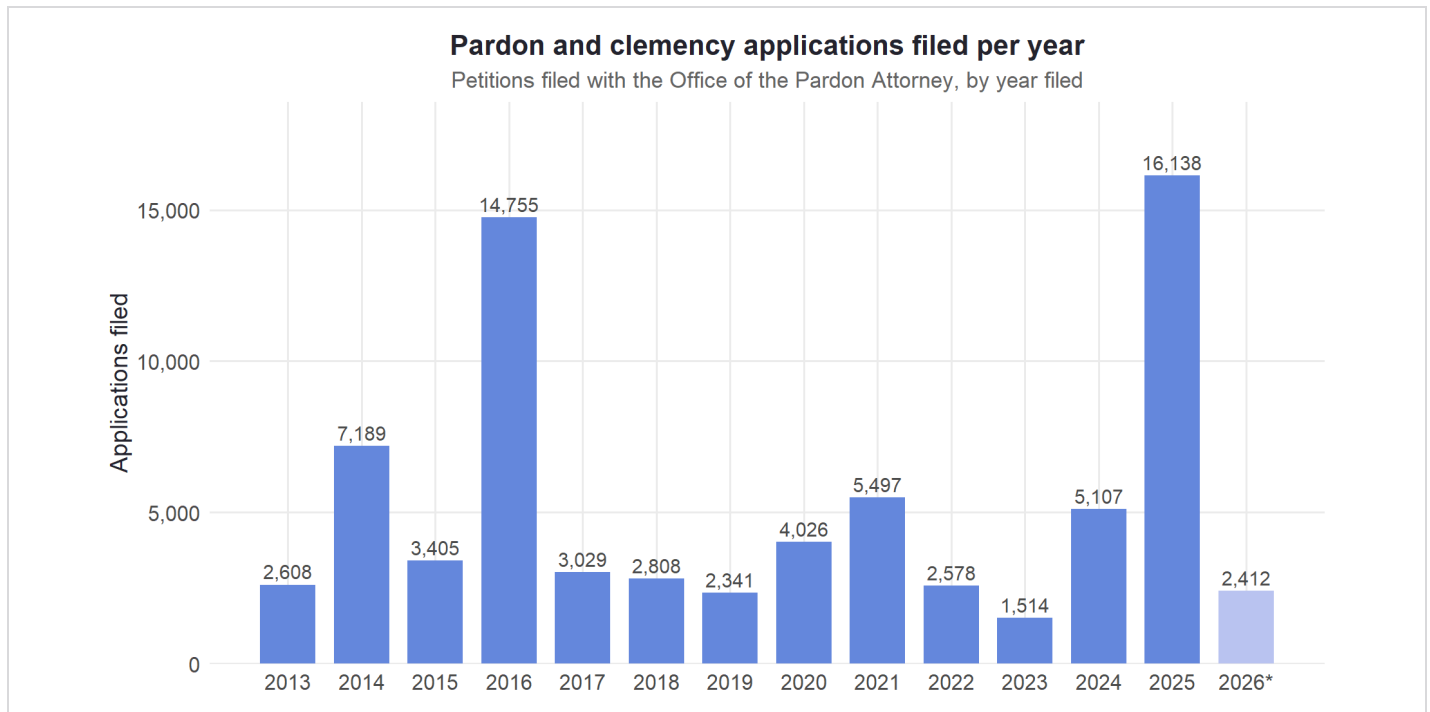
Twenty-seven of our high-risk principal registrations explicitly state an objective of influencing U.S. enforcement actions. The true number is likely higher. Other principals do not declare this as the objective of their lobbying, but are facing pending U.S. enforcement actions. Yet others have obtained favorable outcomes in U.S. enforcement matters without any FARA registration.

Presidential pardon petitions skyrocketed in 2025, with 16,138 [filed](#), up from only 5,107 the previous year (Figure 5).

Three foreign principals state in their FARA filings that they are seeking a pardon. In these cases, none were charged with corruption, and, to date, none have received a pardon.

1. A current [fugitive](#), Andean Medjedovic was [charged](#) by the U.S. Department of Justice in February 2025 in connection with a \$65 million crypto hacking scheme. In February 2026, he retained a firm with the intention to seek a presidential [pardon](#). Medjedovic [admits](#) to the exploit underpinning the hacking allegations but contends it was legitimate interaction with code rather than a crime.
2. Abdeslam Jaidi, a former Moroccan ambassador to the UN, originally hired a law firm to support him as he faced a U.S. indictment for visa [fraud](#). In May 2026, the law firm [filed](#) under FARA when they submitted a pardon application on his behalf.
3. Julian Assange, founder of Wikileaks who [pled](#) guilty in 2024 to conspiring to obtain and disclose classified documents, hired lobbyists in January 2021. The filings explained their goal was to seek a full [pardon](#) with the incoming Biden administration. Assange has not [filed](#) a formal application for a pardon.

A further two foreign principals do not explicitly mention pardons in their filings. In January 2026, Julio Herrera Velutini received a presidential [pardon](#), though he does not appear in the [list](#) of pardon applicants. He had originally pleaded not guilty to the indicted charge. The Campaign Legal Center has filed a [complaint](#) with the Federal Election Commission alleging that a \$3.5 million donation to a Trump super PAC by Herrera Velutini's daughter was in fact on behalf of Herrera Velutini, a foreign national prohibited from contributing to an American election campaign. As previously mentioned, Herrera Velutini's [filings](#) only mention the registrant is acting on behalf of a retained law firm, but the law firm itself does not register under FARA, nor are any of its activities discussed in filings.



**FIGURE 5**

Presidential pardon and clemency applications filed per year with the Office of the Pardon Attorney. The 2025 figure of 16,138 is over three times the 2024 total.

Jho Taek Low appears to have [filed](#) for a presidential pardon according to the Office of the Pardon Attorney list, but none of the five registrants mention a pardon petition in any of their filings. The registrable activity is described uniformly as [legal](#) and consulting advice or public-relations [strategy](#) “with a focus on ... ongoing legal proceedings” and “informing public opinion ... relating to the Malaysian rule of law.” Because all five registrants had ended their relationships with Low by 2024, there were no active FARA registrants remaining in 2026 when he filed his pardon petition.

There is also an example of a pardon petitions with no associated FARA. Panamanian and Italian nationals Luis Enrique Martinelli Linares and Ricardo Enrique Martinelli Linares, sons of the former Panamanian president Ricardo Alberto Martinelli Berrocal, both [pleaded](#) guilty “to conspiracy to commit money laundering” as part of the Odebrecht bribery and money laundering scandal. Having finished their sentences, the brothers [filed](#) for a presidential pardon. Both brothers had pleaded guilty and their lawyers argued they had only a [minor role](#) in the scheme. Neither is listed as a foreign principal under FARA and there are no filings for another foreign principal that mention an application for a presidential pardon on the brothers’ behalf. *La Prensa* recently [reported](#) that Panamanian lawyers, lawmakers and people close to the Martinelli family attended the American Patriots Gala dinner at Mar-a-Lago in April 2025. “The trip was reportedly paid for by the former president, who also bought a table for 12 people at the gala and made his family’s private plane available to the lawmakers,” reports *La Prensa*.

Registrants appear to have taken inconsistent approaches to the question of whether lobbying for a presidential pardon constitutes political activity requiring FARA registration or instead falls within FARA’s exemption for legal representation. At least one firm registered under FARA precisely because it concluded that its pardon-related activities triggered the statute. As with sanctions delisting, unless the Department of Justice clarifies the requirement, foreign nationals seeking to reverse US enforcement actions may continue to avoid FARA disclosure given competing available interpretations.

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## CONSEQUENCES FOR ANTI-CORRUPTION EFFORTS

Over half of the high-risk cases we reviewed seek to influence policy or enforcement actions in foreign countries. Many are countries where the U.S. has historically supported, and even funded, the building of anti-corruption laws and infrastructure. In two cases, we can see where prosecutions by a foreign anti-corruption enforcement agency are being partially unwound.

Several high-risk foreign individual principals come from Albania, where most are facing corruption charges before the country's special anti-corruption court. The U.S. State Department Bureau of International Narcotics and Law Enforcement division and USAID were instrumental in [funding](#) and supporting the Specialized Anti-Corruption Structure (SPAK) under which the special court was established. This is a case where FARA filings are especially revealing, which can not only allow the wider public to monitor how foreign influence is impacting U.S. policy and outcomes, but also those in foreign countries.

In 2023, Arben [Ahmetaj](#), the former deputy prime minister and now a fugitive, was [charged](#) by Albania's special court for corruption and organized crime with corruption, money laundering and concealment of assets in connection with the so-called [Incinerators Affair](#). In January 2024, he [hired](#) a lobby group to "educate policymakers on false criminal accusations" made by Albanian authorities for \$150,000. Informational materials [submitted](#) by the lobby group regard SPAK as a "conduit for political prosecution" and argue its U.S. funding rewarded prioritizing case volume over quality. Albania's Supreme Court [overturned](#) SPAK's asset seizure order for Ahmetaj in June 2026. Mr. Ahmetaj has [rejected](#) the claims of the prosecutors in the Incinerators Affair.

In a similar case, Tirana Mayor Erion Veliaj was [arrested](#) on corruption and fraud charges in February 2025. In March, he [hired](#) a law firm to provide legal, media and strategic advice related to his detention, to which he's now paid \$761,000. He [won](#) reinstatement to office in November, though charges remain. The firm's [supplemental](#) filings record that it briefed members of Congress on Veliaj's detention and due-process concerns, as well as on U.S. funding and training of SPAK. In another effort to influence policymakers on SPAK, lobbyists hired by Berisha's Democratic Party of Albania submitted informational [materials](#) that blamed the State Department and USAID and referred to SPAK as a "political weapon" to undermine democracy and target opposition. Veliaj [denies](#) wrongdoing.

Beyond domestic anti-corruption initiatives abroad, several high-risk cases also relate to enforcement actions brought under U.S. anti-corruption initiatives. The Operation Car Wash and 1MDB prosecutions were part of the Kleptocracy Asset Recovery [Initiative](#), which has recently been dismantled. We see a consistent pattern emerging where the targets of anti-corruption enforcement efforts supported by the U.S. are now lobbying in Washington to undermine those same efforts. If these influence campaigns are successful, this sets a dangerous precedent where the standard for holding corruption accountable shifts according to whoever holds power in Washington. For those seeking to undo consequences of their corrupt acts, each time lobbying works, it confirms that there is a price at which these consequences can be undone.

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## CONCLUSION

When high-risk foreign individuals pay for access in Washington, the public, both in the U.S. and in their home country, has a direct interest in knowing what they hope to achieve, and who is paying for it. Disclosure to the public is at the core of FARA. It not only allows those who want to pay-to-play to hire lobbyists in Washington, but also allows legitimate representation for pro-democracy activists, anti-corruption campaigns and human rights defenders to have a chance to shape American foreign policy or find support for their efforts at home. Banning foreign lobbying outright would be counterproductive. The better approach is to let all such representation continue while scrutinizing the riskiest foreign principals, and their financing, proportionally to the risk they present.

The cases presented as part of this study highlight the need for additional scrutiny. A sizable portion were aiming to unwind corruption prosecutions or sanctions, including some of the most notorious embezzlement, money laundering and bribery scandals of recent years. Our analysis of filings uncovers troubling patterns in how the U.S. government regulates foreign agents. We found significant deficiencies related to how lobbying relationships are disclosed, whether the source of funds were disclosed, or how goals of sanctions delisting or pardon petitions were described as ordinary legal work. As it stands, the current statutes do not demand enough detail to allow for proper accountability from the Department of Justice, the press or the public.

The price of neglecting to properly enforce FARA is that the campaigns by high-risk individuals, foreign criminals and corrupt officials to achieve impunity will continue to go unnoticed. Activities such as attempts to shut down criminal investigations will continue with little scrutiny. The case of the prosecution of Paul Manafort shows how enforcement can lead to measurable change, but registration alone does not ensure meaningful transparency.

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## NOTES

1. This includes 10 cases of pro-bono lobbying contracts.
2. Much of the spending during the two Trump administrations are based on estimates from contract data, including a 2020 \$10 million [contract](#) that did not include follow-up confirmation.
3. Foreign government lobbying may also involve political activity that benefits a particular individual.
4. While standard transactions between a U.S. person or company and a person sanctioned by the U.S. are illegal, licenses granted by OFAC make would be a transaction between a sanctioned individual and a lobbyist possible when approved.
5. At the time, Troost was also [sanctioned](#) by the EU. He was reportedly [removed](#) from the list in March 2026 by the Council of Europe but still [remains](#) in the EU sanctions tracker database in June 2026.

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### THE LENIENCY LOBBY: HOW THE U.S. LETS GLOBAL CORRUPTION OFF THE HOOK

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**Authors:** Michelle Kendler-Kretsch, David Szakonyi, Michael Hornsby

Every attempt has been made to ensure the information presented in this report is accurate as of July 2026. Please contact [team@acdatacollective.org](mailto:team@acdatacollective.org) with any enquiries.

The Anti-Corruption Data Collective (ACDC) leverages public and private data to expose transnational corruption, illicit financial activity and corporate opacity. Our research and investigations seek to document and reduce the harms that corruption causes to human security, democratic participation and environmental sustainability: to People, Politics and Planet.

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